

## **REMARKS**

Applicant respectfully traverses and requests reconsideration.

Claims 1, 4-9 and 11-15, 17-20, 22-23 and 26-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cheng et al. in view of Venkatesan in further view of Thawte's "Web Server Certificates: 3.x Root Rollover".

As to claim 28, which was added in the last response, Applicant respectfully submits that the claim has not been properly rejected and is therefore in condition for allowance. For example, the office action states that claim 28 corresponds to claims 1, 9 and 23 and as such, are rejected in the same manner. However, Applicant respectfully notes that the rejection of claim 23 is also an indirect rejection alleging it corresponds to claims 1, 4-9 and/or 11. However, claims 1, 4-9 and 11 do not describe the subject matter required in claim 23 such as, for example, the specific communication between a web browser and web server and the detection of an update for a web certificate data for the web browser and an automatic redirection of communication from a web browser and the web server nor the web certificate update complete data as required in the claim. Since this language was not addressed, the claims have not been properly rejected and as such, these claims are in condition for allowance. In addition, claim 28 indicates that the need to update a web certificate data for a web browser is based on the communication with a web server. Also this language does not appear to be addressed in the limitations of claims 1, 4-9 or 11 and as such, the office action has not provided a prima facie rejection and as such, these claims are in condition for allowance.

In addition, Cheng actually requires the downloading of a database of software modules to a client and the client then determines whether or not an update is required. In contrast, the claim requires detecting a need to update web certificate data for a web browser based on a

communication with a web browser. No such operation is taught or suggested by Cheng with respect, for example, to claim 28.

Moreover claim 1 requires, among other things, detecting a need to update root CA certificate data for the first processing entity, based on a communication with a second processing entity. Cheng has been cited as teaching this limitation except for it is admitted that Cheng does not teach detecting a need to update root CA certificate data nor does it teach providing updated root CA certificate data for a first processing entity nor providing update complete data which is different from the updated root CA certificate data. However, Applicant respectfully submits that Cheng does not teach what is alleged. For example, Cheng does not teach, among other things, detecting a need to update data such as the claimed root CA certificate, for a first processing entity, based on a communication with a second processing entity. As noted in the cited portion of Cheng, it is the client in Cheng that determines which software updates are applicable based on a downloaded portion of a database to the client computer. As such, it is the client that must download the database and determine from the downloaded database whether software updates are applicable for the client unit itself. The claim requires that a second processing entity make the claimed determination. Accordingly, Applicant respectfully submits that the claim is in condition for allowance.

In addition, the Thawte reference has been combined with both Cheng and Venkatesan in an attempt to obviate the claimed subject matter. However, Applicant respectfully submits that the Thawte reference when combined with Cheng and Venkatesan does not teach the claimed subject matter since the Thawte reference does not provide any automatic updated root CA certificate data for a processing entity by a third processing entity. Instead, Thawte teaches that a user must manually navigate through a web browser by inputting URLs to apparently obtain a

new root CA certificate. There does not appear to be any automatic detection or automatic providing of updated root CA certificates as required by the claim. In fact, Thawte teaches a different approach from that claimed and as such, its teaching cannot render the claimed invention obvious. Other differences will be recognized by those of ordinary skill in the art and as such, claim 1 is in condition for allowance.

The other independent claims having similar language are also allowable for the reasons stated above, and as such, these claims are also in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

As to claim 23, Applicant respectfully reasserts the relevant remarks made above with respect to Cheng. Accordingly, this claim is also in condition for allowance.

Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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